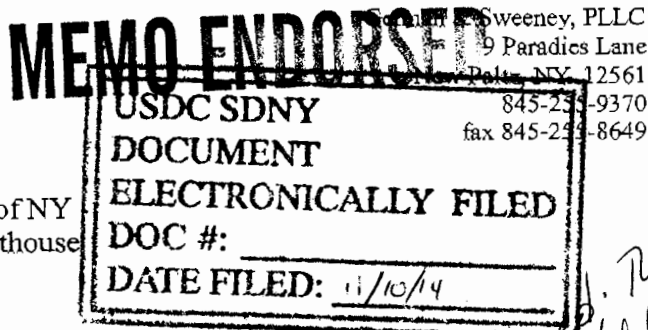


GETMAN SWEENEY

November 5, 2014

Hon. Frank Maas
U.S. Magistrate Judge
U.S. District Court for the Southern District of NY
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312
VIA ECF



Re: Enea et al v. Bloomberg L.P., 1:12-cv-04656-GBD-FM

Dear Judge Maas:

Plaintiffs file this letter to request a short extension to the briefing deadlines and confirmation of the process by which Plaintiffs will file their motion to compel. The reason for the extension is that the Plaintiffs need additional time to prepare their papers following the conclusion of depositions, in part due to vacation and holiday schedules.

Proposed Briefing Schedule

Your Honor's Order dated October 28, 2014 (Doc. 92) states that "Plaintiffs' motion to compel shall be filed by November 14, 2014, Defendant's opposition shall be filed by December 3, 2014, and Plaintiffs may file a reply by December 12, 2014."

Plaintiffs request that the deadlines be extended one week as follows: **Plaintiffs' motion to compel shall be filed by November 21, 2014, Defendant's opposition shall be filed by December 10, 2014, and Plaintiffs may file a reply by December 19, 2014.**

This is Plaintiffs' first request for an extension related to this motion. Defendant does not object to the request.

Process for Filing of Documents Designated as Confidential

Defendant designated most discovery produced in this case as confidential and has recently designated the depositions of counsel as confidential. Rather than file all moving papers and supporting documents under seal, the parties propose that on November 21, Plaintiffs will file a notice of motion but no supporting documents. Plaintiffs will simultaneously serve all supporting documents on Defendants. The parties will then meet and confer regarding redactions to the moving papers and decide which supporting documents must be filed under seal. The parties will repeat this process for Opposition on December 10, 2014 and for Reply on December 19, 2014.

Approved: [Signature]
Reply shall be
due 12/1/14.
Maas, USMT
11/10/14

7M

No later than December 29, Plaintiffs will file a request to file documents under seal and corresponding redactions after the parties have met and conferred. At that time, the parties will file redacted briefs on ECF and Plaintiffs will deliver to chambers two courtesy copies of all unredacted motion papers and documents.

We believe this process is the most efficient way to proceed with Plaintiffs' motion. Accordingly, the parties respectfully request that Your Honor endorse the proposed process.

Sincerely,

/s/ Lesley Tse